

GROUP EXHIBIT A

Return Date: No return date scheduled
Hearing Date: 7/20/2021 9:45 AM - 9:45 AM
Courtroom Number: 2508
Location: District 1 Court
Cook County, IL

FILED
3/26/2021 4:14 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021CH01334

ClientCaseID: 62494

CaseReturnDate: 3/25/21

Affidavit of A PRIVATE INVESTIGATOR

12737659

COOK COUNTY STATE OF ILLINOIS, CIRCUIT COURT

Case Number **2021-CH-01334**

I, JOHN PENNELL

FIRST DULY SWORN ON OATH STATES THAT I AM OVER 18 YEARS OF AGE AND NOT A PARTY TO THIS SUIT AND LICENSED AS A PRIVATE DETECTIVE (LICENSE # 115.002074) UNDER THE PRIVATE DETECTIVE ACT OF 2004.

CORPORATE SERVICE

THAT I SERVED THE WITHIN **SUMMONS & COMPLAINT**
ON THE WITHIN NAMED DEFENDANT **I.Q. DATA INTERNATIONAL, INC.**
PERSON SERVED **MATT DIERKING, AUTHORIZED AGENT**
BY LEAVING A COPY OF EACH WITH THE SAID DEFENDANT ON 3/25/21

That the sex, race and approximate age of the whom I left the **SUMMONS & COMPLAINT**
are as follow:

Sex MALE Race WHITE Age 28 Height 6'1" Build 190# Hair BRN

LOCATION OF SERVICE **801 ADLAI STEVENSON DR.**
SPRINGFIELD, IL, 62703

Date Of Service 3/25/21

Time of Service 1:12 PM

JOHN PENNELL

3/25/2021

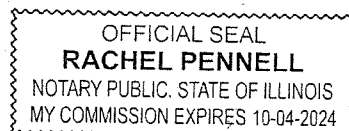
A PRIVATE INVESTIGATOR

PRIVATE DETECTIVE # 115.002074

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statement are true and correct, except as to matters therein stated to be on information and belief and such matters the undersigned believes same to be true.

Signed and sworn (or affirmed) to before
me on 3-25-2021 (date) by

Rachel Pennell
(name/s of person/s making statement).
(Seal) (Notary Public Signature)



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12650044

2120 - Served	2121 - Served	2620 - Sec. of State
2220 - Not Served	2221 - Not Served	2621 - Alias Sec of State
2320 - Served By Mail	2321 - Served By Mail	
2420 - Served By Publication	2421 - Served By Publication	
Summons - Alias Summons		(12/01/20) CCG 0001 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

SCOTT HIMMEL and
DEBORAH HIMMEL,

Plaintiff(s)

v.

I.Q. DATA INTERNATIONAL, INC., and
WIRTZ REALTY CORPORATION,

Defendant(s)

I.Q. Data International, Inc.
c/o Illinois Corporation Service Co.
801 Adlai Stevenson Drive
Springfield, IL 62703

Address of Defendant(s)

2021CH01334

Case No.

Please serve as follows (check one): ☐ Certified Mail ☒ Sheriff Service ☐ Alias

SUMMONS

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

THERE WILL BE A FEE TO FILE YOUR APPEARANCE.

To file your written appearance/answer **YOU DO NOT NEED TO COME TO THE COURTHOUSE.** You will need: a computer with internet access; an email address; a completed Appearance form that can be found at <http://www.illinoiscourts.gov/Forms/approved/procedures/appearance.asp>; and a credit card to pay any required fees.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

Summons - Alias Summons

(12/01/20) CCG 0001 B

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp> or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit www.illinoislegalaid.org.

If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to www.illinoislegalaid.org. You can also ask your local circuit clerk's office for a fee waiver application.

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CONTACT THE CLERK'S OFFICE for information regarding COURT DATES by visiting our website: cookcountyclerkofcourt.org; download our mobile app from the AppStore or Google play, or contact the appropriate clerk's office location listed on Page 3.

To the officer: (Sheriff Service)

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than thirty (30) days after its date.

● Atty. No.: 41106
○ Pro Se 99500

Witness date _____
3/19/2021 4:51 PM IRIS Y. MARTINEZ

Name: Daniel A. Edelman

Atty. for (if applicable):

Scott Himmel and Deborah Himmel

Address: 20 S. Clark St., Ste. 1500

City: Chicago

State: IL Zip: 60603

Telephone: (312) 739-4200

Primary Email: tgoodwin@edcombs.com, ccengher@edcombs.com, courtecl@edcombs.com

IRIS Y. MARTINEZ, Clerk of Court

☐ Service by Certified Mail

☐ Date of Service _____
(To be inserted by officer on copy left with employer or other person)



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GET YOUR COURT DATE BY CALLING IN OR BY EMAIL

CALL OR SEND AN EMAIL MESSAGE to the telephone number or court date email address below for the appropriate division, district or department to request your next court date. Email your case number, or, if you do not have your case number, email the Plaintiff or Defendant's name for civil case types, or the Defendant's name and birthdate for a criminal case.

CHANCERY DIVISION

Court date EMAIL: ChanCourtDate@cookcountycourt.com
Gen. Info: (312) 603-5133

CIVIL DIVISION

Court date EMAIL: CivCourtDate@cookcountycourt.com
Gen. Info: (312) 603-5116

COUNTY DIVISION

Court date EMAIL: CntyCourtDate@cookcountycourt.com
Gen. Info: (312) 603-5710

**DOMESTIC RELATIONS/CHILD SUPPORT
DIVISION**

Court date EMAIL: DRCourtDate@cookcountycourt.com
OR
ChildSupCourtDate@cookcountycourt.com
Gen. Info: (312) 603-6300

DOMESTIC VIOLENCE

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Gen. Info: (312) 325-9500

LAW DIVISION

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Gen. Info: (312) 603-5426

PROBATE DIVISION

Court date EMAIL: ProbCourtDate@cookcountycourt.com
Gen. Info: (312) 603-6441

ALL SUBURBAN CASE TYPES

DISTRICT 2 - SKOKIE

Court date EMAIL: D2CourtDate@cookcountycourt.com
Gen. Info: (847) 470-7250

DISTRICT 3 - ROLLING MEADOWS

Court date EMAIL: D3CourtDate@cookcountycourt.com
Gen. Info: (847) 818-3000

DISTRICT 4 - MAYWOOD

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DISTRICT 5 - BRIDGEVIEW

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DISTRICT 6 - MARKHAM

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MAR 25 2021

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Name: Daniel A. Edelman

Atty. for (if applicable):

Scott Himmel and Deborah Himmel

IRIS Y. MARTINEZ, Clerk of Court

Address: 20 S. Clark St., Ste. 1500

City: Chicago

State: IL Zip: 60603

Telephone: (312) 739-4200

Primary Email: tgoodwin@edcombs.com, ccengher@edcombs.com, courtecl@edcombs.com

☐ Service by Certified Mail
☐ Date of Service _____
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MAR 25 2021

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COOK COUNTY, IL

12650044

Chancery Division Civil Cover Sheet
General Chancery Section

(12/01/20) CCCH 0623

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

SCOTT HIMMEL and
DEBORAH HIMMEL,

Plaintiff

v.
I.Q. DATA INTERNATIONAL, INC., and
WIRTZ-REALTY CORPORATION,

Defendants

Case No: 2021CH01334

CHANCERY DIVISION CIVIL COVER SHEET
GENERAL CHANCERY SECTION

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the box in front of the appropriate category which best characterizes your action being filed.

Only one (1) case type may be checked with this cover sheet.

0005 ☐ Administrative Review
0001 ☐ Class Action
0002 ☒ Declaratory Judgment
0004 ☐ Injunction

0007 ☐ General Chancery
0010 ☐ Accounting
0011 ☐ Arbitration
0012 ☐ Certiorari
0013 ☐ Dissolution of Corporation
0014 ☐ Dissolution of Partnership
0015 ☐ Equitable Lien
0016 ☐ Interpleader

0017 ☐ Mandamus
0018 ☐ Ne Exeat
0019 ☐ Partition
0020 ☐ Quiet Title
0021 ☐ Quo Warranto
0022 ☐ Redemption Rights
0023 ☐ Reformation of a Contract
0024 ☐ Rescission of a Contract
0025 ☐ Specific Performance
0026 ☐ Trust Construction
0050 ☐ Internet Take Down Action (Compromising Images)
☐ Other (specify) _____

☒ Atty. No.: 41106 ☐ Pro Se 99500

Atty Name: Daniel A. Edelman

Atty. for: Scott Himmel and Deborah Himmel

Address: 20 S. Clark St., Ste. 1500

City: Chicago State: IL

Zip: 60603

Telephone: (312) 739-4200

Primary Email: tgoodwin@edcombs.com, ccengher@edcombs.com, courtec1@edcombs.com

Pro Se Only: ☐ I have read and agree to the terms of the Clerk's
Clerk's Office Electronic Notice Policy and
choose to opt in to electronic notice from the
Clerk's office for this case at this email address:

Email: _____

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

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3/19/2021 4:51 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021CH01334

Atty. No. 41106

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

SCOTT HIMMEL and
DEBORAH HIMMEL,

Plaintiffs,

v.

I.Q. DATA INTERNATIONAL, INC., and
WIRTZ REALTY CORPORATION,

Defendants.

COMPLAINT – DECLARATORY AND INJUNCTIVE RELIEF

INTRODUCTION

1. Plaintiffs Scott Himmel and Deborah Himmel seek redress against attempts by Defendants I.Q. Data International, Inc. (“IQ Data”) and Wirtz Realty Corporation d/b/a Wirtz Residential (“Wirtz”) to collect from Plaintiffs money that is not owed. Plaintiffs seek a declaration that nothing is owed, injunctive relief against further collection efforts, and damages for violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. (“FDCPA”) and Fair Credit Reporting Act, 15 U.S.C. §1681 et seq. (“FCRA”).

PARTIES

2. Plaintiffs Scott Himmel and Deborah Himmel are residents of Chicago, Illinois.

3. Defendant I.Q. Data International, Inc. (“IQ Data”), is a corporation organized under the law of the State of Washington. Its principal place of business is located at 21222 30th Drive SE, Suite 120, Bothell, WA 98021. It does business in Illinois. Its registered agent and office is Illinois Corporation Service Co., 801 Adlai Stevenson Drive, Springfield, IL 62703.

4. IQ Data operates a collection agency, using the mails and telephone system to collect debts allegedly owed by others. Its principal business is debt collection.

5. IQ Data has a website (<https://www.iqdata-inc.com/about-us>) on which it states that it “has been serving the collection needs of businesses and consumers since 1998,” that “We

are a Professional Collection Agency, providing services to the apartment industry,” and that it is “100% DEDICATED TO THE MULTI FAMILY HOUSING INDUSTRY.”

6. IQ Data reports to one or more of the major credit bureaus.

7. IQ Data is a debt collector as defined in the FDCPA.

8. Defendant Wirtz Realty Corporation d/b/a Wirtz Residential (“Wirtz”) is a Delaware corporation which does business in Illinois. Its registered agent and office is Nadine Heidrich, 680 N Lake Shore Dr., 19th Flr., Chicago, IL 60611.

FACTS

9. Defendant IQ Data has been reporting to credit bureaus and attempting to collect from Plaintiffs a nonexistent debt allegedly owed by Plaintiffs to Defendant Wirtz, purporting to represent unpaid rent.

10. In December 2017, Plaintiffs had an apartment lease with Wirtz.

11. The condition of the leased premises was poor, giving rise to potential claims, and Wirtz’ manager wanted to renovate the apartment.

12. Plaintiffs agreed with the on-premises representative of Wirtz to promptly move out in exchange for a waiver of further obligations under the lease.

13. Plaintiffs did move out on January 23, 2018.

14. The arrangement amounted to an accord and satisfaction.

15. The existence of the agreement is shown by the fact that credits of \$892.65 rent and \$10.32 storage were given for the remaining 8 days of January 2018 on the ledger maintained by Wirtz (Exhibit A).

16. Obviously, no credits would have been given had there been further rent obligations owing.

17. After doing nothing for a number of months, Wirtz sent the alleged debt to IQ Data to collect the waived balance.

18. Nothing is owed.

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19. IQ Data reported the alleged debt to Trans Union and Experian.
20. On October 21, 2020, Plaintiff Scott Himmel sent a letter to credit bureaus Trans Union (Exhibit B) and Experian (Exhibit C) disputing the alleged debt.
21. On December 8, 2020, IQ Data sent Plaintiffs a letter (Exhibit D) with an enclosed ledger (Exhibit A) purporting to verify the debt and demanding that Plaintiffs pay it.
22. In fact, the ledger showed the claimed balance had been waived.
23. IQ Data's letter identified the creditor as "3260-3270 N LAKE SHORE DR (IL)," which is a description of the building at which the leased premises were located, not the name of a person or entity to whom money is allegedly owed.
24. On February 24, 2021, Plaintiff, by counsel, wrote to each of the major credit bureaus, including Trans Union and Experian, with a copy to IQ Data, disputing the alleged debt (Exhibit E).
25. In investigating these disputes, the credit bureaus contacted IQ Data.
26. IQ Data responded to the credit bureaus that the debt was valid.
27. IQ Data failed to investigate whether the debt existed, or inquire of Wirtz why credits had been given if amounts were still owed.
28. As a result, the purported debt continued to be reported on Plaintiffs' credit reports, under the name of IQ Data (Exhibits F-G).
29. IQ Data reports debts to credit bureaus to coerce payment of them. Reporting a debt to a credit bureau is "a powerful tool designed, in part, to wrench compliance with payment terms. . . ." *Rivera v. Bank One*, 145 F.R.D. 614, 623 (D.P.R. 1993).
30. All acts by IQ Data complained of herein were taken on behalf of Wirtz, as its authorized agent acting within the scope of its authority.
31. The continued reporting of the purported debt has caused damage to Plaintiffs, including:
 - a. Inability to enter into credit and housing transactions;

- b. Time and money spent dealing with Defendants' actions;
- c. Aggravation and distress.

COUNT I – DECLARATORY AND INJUNCTIVE RELIEF

- 32. Plaintiffs incorporate paragraphs 1-31.
- 33. This claim is against both Defendants.
- 34. There is a controversy between Plaintiffs and Defendants as to whether Plaintiffs owe anything to Defendants.

- 35. A declaratory judgment is necessary and appropriate to resolve such controversy.

Tepper v. County of Lake, 233 Ill. App. 3d 80, 598 N.E.2d 361 (2d Dist. 1992).

- 36. Injunctive relief against extrajudicial collection attempts is also necessary to prevent further injury to Plaintiffs.

WHEREFORE, Plaintiffs request that the Court enter judgment in favor of Plaintiffs and against Defendants for:

- i. A declaration that Plaintiffs owe nothing to Defendants;
- ii. An injunction restraining Defendants from taking any action to collect from Plaintiffs;
- iii. Costs;
- iv. Such other or further relief as is proper.

COUNT II – FDCPA

- 37. Plaintiffs incorporate paragraphs 1-31.
- 38. This claim is against IQ Data.
- 39. The FDCPA broadly prohibits unfair or unconscionable collection methods, conduct which harasses or abuses any debtor, and the use of any false or deceptive statements in connection with debt collection attempts. It also requires debt collectors to give debtors certain information. 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.

- 40. In enacting the FDCPA, Congress found that: “[t]here is abundant evidence of the

use of abusive, deceptive, and unfair debt collection practices by many debt collectors. Abusive debt collection practices contribute to the number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy.” 15 U.S.C. §1692(a).

41. Because of this, courts have held that “the FDCPA’s legislative intent emphasizes the need to construe the statute broadly, so that we may protect consumers against debt collectors’ harassing conduct” and that “[t]his intent cannot be underestimated.” *Ramirez v. Apex Financial Management LLC*, 567 F.Supp.2d 1035, 1042 (N.D. Ill. 2008).

42. The FDCPA encourages consumers to act as “private attorneys general” to enforce the public policies and protect the civil rights expressed therein. *Crabill v. Trans Union, LLC*, 259 F.3d 662, 666 (7th Cir. 2001).

43. Plaintiffs seek to enforce those policies and civil rights which are expressed through the FDCPA, 15 U.S.C. §1692 *et seq.*

44. Defendant violated 15 U.S.C. §§1692e, 1692e(2), 1692e(8) and 1692e(10) by:

- a. Demanding payment of amounts not owed;
- b. Misrepresenting the person to whom amounts were allegedly owed.

45. Section 1692e provides:

False or misleading representations

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section: . . .

(2) The false representation of—

(A) the character, amount, or legal status of any debt; . . .

(8) Communicating or threatening to communicate to any person credit information which is known or which should be known to be false, including the failure to communicate that a disputed debt is disputed. . . .

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer. . . .

WHEREFORE, the Court should enter judgment in favor of Plaintiff and against Defendant IQ Data for:

- i. Statutory damages;
- ii. Actual damages;
- iii. Attorney's fees, litigation expenses and costs of suit;
- iv. Such other and further relief as the Court deems proper.

COUNT III – FCRA

- 46. Plaintiffs incorporate paragraphs 1-31.
- 47. This claim is against both Defendants.
- 48. Defendants violated the Fair Credit Reporting Act, 15 U.S.C. §1681s-2(b), by:

- a. Failing to investigate Plaintiffs' dispute when it was forwarded by the credit bureaus;
- b. Providing false information to the credit bureaus when they contacted Defendants in response to Plaintiffs' disputes.

- 49. Section 1681s-2(b) provides:

- (b) Duties of furnishers of information upon notice of dispute.

(1) In general. After receiving notice pursuant to section 611(a)(2) [15 USC §1681i(a)(2)] of a dispute with regard to the completeness or accuracy of any information provided by a person to a consumer reporting agency, the person shall

(A) conduct an investigation with respect to the disputed information;

(B) review all relevant information provided by the consumer reporting agency pursuant to section 611(a)(2) [15 USC §1681i(a)(2)];

(C) report the results of the investigation to the consumer reporting agency; and

(D) if the investigation finds that the information is incomplete or inaccurate, report those results to all other consumer reporting agencies to which the person furnished the information and that compile and maintain files on consumers on a nationwide basis.

(2) Deadline. A person shall complete all investigations, reviews, and reports required under paragraph (1) regarding information provided by the person to a consumer reporting agency, before the expiration of the

period under section 611(a)(1) [15 USC §1681i(a)(1)] within which the consumer reporting agency is required to complete actions required by that section regarding that information.

50. Defendants committed such violations willfully or negligently, thereby violating 15 U.S.C. §1681n and/or §1681o.

51. Section 1681n provides:

§1681n. Civil liability for willful noncompliance

(a) In general. Any person who willfully fails to comply with any requirement imposed under this title with respect to any consumer is liable to that consumer in an amount equal to the sum of--

(1)

(A) any actual damages sustained by the consumer as a result of the failure or damages of not less than \$100 and not more than \$1,000; or

(2) such amount of punitive damages as the court may allow; and

(3) in the case of any successful action to enforce any liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court. . . .

52. Section 1681o provides:

§1681o. Civil liability for negligent noncompliance

(a) In general. Any person who is negligent in failing to comply with any requirement imposed under this title with respect to any consumer is liable to that consumer in an amount equal to the sum of--

(1) any actual damages sustained by the consumer as a result of the failure;

(2) in the case of any successful action to enforce any liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court.

WHEREFORE, Plaintiffs request that the Court enter judgment in favor of Plaintiffs and against Defendants for:

- i. Actual damages;
- ii. Punitive damages;

- iii. Statutory damages;
- iv. Attorney's fees, litigation expenses and costs of suit;
- v. Such other or further relief as the Court deems proper.

/s/ Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
Tara L. Goodwin
Carly M. Cengher

**EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC**

20 South Clark Street, Suite 1500
Chicago, IL 60603-1824
(312) 739-4200
(312) 419-0379 (FAX)
Email address for service:
courtecl@edcombs.com
Atty. No. 41106 (Cook)

NOTICE OF LIEN AND ASSIGNMENT

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

/s/ Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
20 S. Clark Street, Suite 1500
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

T:\37612\Pleading\Complaint_Pleading.WPD

Return Date: No return date scheduled
Hearing Date: 7/20/2021 9:45 AM - 9:45 AM
Courtroom Number: 2508
Location: District 1 Court
Cook County, IL

FILED
3/19/2021 4:51 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021CH01334

12650044

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

EXHIBIT A

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

07/01/2017	k	Guest Park	14.00	0.00	170258
07/01/2017	rent	Monthly Rent (07/2017)	3,459.00	3,459.00	171254
07/01/2017	storage	Storage (07/2017)	40.00	3,499.00	171360
07/11/2017	lat	Late Fees	10.00	3,509.00	173356
07/11/2017	lat	Late Fee #2	147.95	3,656.95	173511
08/01/2017	keyfee	lobby key	25.00	3,681.95	
08/01/2017	ele	Electric 6/5-7/6/17	286.38	3,968.33	173852
08/01/2017	rent	Monthly Rent (08/2017)	3,459.00	7,427.33	175181
08/01/2017	storage	Storage (08/2017)	40.00	7,467.33	175286
08/01/2017	gpk	Guest Parking	15.00	7,483.33	176465
08/11/2017	lat	Late Fees	10.00	7,493.33	177285
08/11/2017	lat	Late Fee #2	147.95	7,641.28	177396
09/01/2017	ele	Electric 7/6-8/3/17	288.08	7,929.36	177659
09/01/2017	gpk	Guest Parking	140.00	8,069.36	178029
09/01/2017	rent	Monthly Rent (09/2017)	3,459.00	11,528.36	179017
09/01/2017	storage	Storage (09/2017)	40.00	11,568.36	179150
09/11/2017	lat	Late Fees	10.00	11,578.36	181086
09/11/2017	lat	Late Fee #2	147.95	11,726.31	181210
10/01/2017	ele	Electric 8/3-9/6/17	329.28	12,055.59	181481
10/01/2017	gpk	Guest Parking	60.00	12,115.59	181699
10/01/2017	rent	Monthly Rent (10/2017)	3,459.00	15,574.59	182864
10/01/2017	storage	Storage (10/2017)	40.00	15,614.59	182957
10/11/2017	lat	Late Fees	10.00	15,624.59	184945
10/11/2017	lat	Late Fee #2	147.95	15,772.54	184964
10/17/2017	chkr	9015830809	10,377.00	5,395.54	195995
10/25/2017	chkr	9470329757	5,395.54	0.00	196485
11/01/2017	ele	Electric 9/6-10/4/17	223.66	223.66	185108
11/01/2017	rent	Monthly Rent (11/2017)	3,459.00	3,682.66	186436
11/01/2017	storage	Storage (11/2017)	40.00	3,722.66	186537
11/01/2017	gpk	Guest Parking	26.00	3,748.66	187768
11/11/2017	lat	Late Fees	10.00	3,758.66	188352
11/11/2017	lat	Late Fee #2	147.95	3,906.61	188411
12/01/2017	ele	Electric 10/4-11/3/17	103.13	4,014.74	188567
12/01/2017	gpk	Guest Parking	18.00	4,032.74	188827
12/01/2017	rent	Monthly Rent (12/2017)	3,459.00	7,491.74	189989
12/01/2017	storage	Storage (12/2017)	40.00	7,531.74	190083
12/11/2017	lat	Late Fees	10.00	7,541.74	191677
12/11/2017	lat	Late Fee #2	147.95	7,689.69	191760
01/01/2018	ele	Electric 11/3-12/5/2017	56.53	7,746.22	191971
01/01/2018	rent	Monthly Rent (01/2018)	3,459.00	11,205.22	193271
01/01/2018	storage	Storage (01/2018)	40.00	11,245.22	193372
01/01/2018	gpk	Guest Parking	28.00	11,273.22	194635
01/11/2018	lat	Late Fees	10.00	11,283.22	196192
01/11/2018	lat	Late Fee #2	147.95	11,431.17	196396
01/23/2018	rent	Monthly Rent (01/2018) Credit 8 days	(892.65)	10,538.52	206939
01/23/2018	rent	Monthly Rent (02/2018) Credit 28 days	(3,459.00)	7,079.52	209840

01/23/2018	storage	Storage (01/2018) Credit 8 days	(10.32)	7,069.20	1
01/23/2018	storage	Storage (01/2018) Credit 28 days	(40.00)	7,029.20	209942
02/01/2018	gpk	Guest Parking	24.00	7,053.20	
02/01/2018	ele	Electric 12/5/17-1/4/18	59.25	7,112.45	195577
02/01/2018	rent	Monthly Rent (02/2018)	3,459.00	10,571.45	196976
02/01/2018	storage	Storage (02/2018)	40.00	10,611.45	107076
02/13/2018	ele	Electric 1/4-1/23/18	27.93	10,639.38	199132

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

EXHIBIT B

October 21, 2020

TransUnion
P.O. Box 2000
Chester, PA 19022

Dear TransUnion:

I recently challenged problematic material on my credit report. In response, you have refused to conduct a full reinvestigation and have summarily verified the matter and may have violated the Fair Credit Reporting Act and perhaps other applicable state statutes. I now request that you revisit this immediately in a more responsibly thorough manner.

To assist your investigation, I have attached documentation, which may support this request regarding this data:

Account Holder(s): IQ Data International

Account Number(s): IQDOWRC0048505017

IQ Data International is currently reporting I owe \$12,032. Acct#IQDOWRC0048505017. When I requested a copy of the bill I found that I am being billed for items that are incorrect.

We came to a mutual agreement with the Landlord at the latter part of December. Wirtz wanted the apartment to do renovations (it was the only un-renovated apartment on the floor). The agreement was we would vacate by late January.

We moved out January 23, 2018, within 30 days, and they agreed that our lease would be terminated upon our move out date (1/23), and any past rent due (about \$6000) plus any further rent would not be owed to them. This was an accommodation to both of us. We wanted to leave because of the poor condition of the unit, and they wanted us to leave so they could renovate.

We told them the date of the move 21 days in advance and their entire staff and management were very helpful in assisting our movers when we did move.

When we moved out on January 23, 2018, they gave us an 8 day credit at that time, for \$892.65, because we were out before the end of the month. And they also gave us 28 days of credit for February, because our lease expired in March. They also gave us 8 days credit, \$10.32, for storage until the end of January, and another \$40 credit for storage in February. So we had credits worth \$4401.32. You can see this properly reflected on the January 23rd line, for storage, in the amount of \$7029.20.

This is proof that we had moved out, and that they were aware that we had moved out. So you can imagine our surprise when they didn't say anything to us about the past due rent, didn't forgive it as

promised, sat on it for months, and then turned it over to a collection agency. They didn't notify us of the claimed overdue amount, giving us a chance to properly contest it, until it was sent to IQ Data who contacted us.

Even if that information was correct the date of first delinquency would not be correct. That date would not be May 2019, it would go back to the date they are first claiming we are overdue, which would be November 2017.

Under USC 1681i if a disputed items is found to be inaccurate or incomplete the CRA must delete or modify the information and notify the furnisher. Here the information is inaccurate, because we had a verbal agreement that released us from our contract on move out so that they could renovate, and that alone would cause this bill to be inaccurate where they billed us after we had moved out, and if they are unwilling to honor that agreement the date of first delinquency would be November 2017, not May 2019 as they are claiming.

If you don't think that alone is enough to remove the item, than you need to conduct a reasonable investigation. In a case like ours, where there was a verbal agreement, IQ Data is not in a position to know what the agreement was, so you'll need to go back to Wirtz about the agreement.

Finally, if there is a question about the evidence presented, because the FCRA is a consumer protection statute and is supposed to be interpreted in favor of the consumer please remember to err on the side of the consumer.

When you have removed the item, or completed your investigation, please let me know the outcome, along with any additional information your reinvestigation may have uncovered.

I anticipate that your review will result in a deletion of this questionable information. Within the 30 day period specified by federal law, please revise my credit file accordingly and respond to me by letter in kind. Otherwise, I may be forced to escalate this matter legally.

Thank you for your careful attention.

Yours truly,

[REDACTED]

Scott Himmel

[REDACTED]

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

EXHIBIT C

October 21, 2020

Experian
P.O. Box 9701
Allen, TX 75013

Dear Experian:

I recently challenged problematic material on my credit report. In response, you have refused to conduct a full reinvestigation and have summarily verified the matter and may have violated the Fair Credit Reporting Act and perhaps other applicable state statutes. I now request that you revisit this immediately in a more responsibly thorough manner.

To assist your investigation, I have attached documentation, which may support this request regarding this data:

Account Holder(s): IQ Data International

Account Number(s): IQDOWRC0048505017

IQ Data International is currently reporting I owe \$12,032. Acct#IQDOWRC0048505017. When I requested a copy of the bill I found that I am being billed for items that are incorrect.

We came to a mutual agreement with the Landlord at the latter part of December. Wirtz wanted the apartment to do renovations (it was the only un-renovated apartment on the floor). The agreement was we would vacate by late January.

We moved out January 23, 2018, within 30 days, and they agreed that our lease would be terminated upon our move out date (1/23), and any past rent due (about \$6000) plus any further rent would not be owed to them. This was an accommodation to both of us. We wanted to leave because of the poor condition of the unit, and they wanted us to leave so they could renovate.

We told them the date of the move 21 days in advance and their entire staff and management were very helpful in assisting our movers when we did move.

When we moved out on January 23, 2018, they gave us an 8 day credit at that time, for \$892.65, because we were out before the end of the month. And they also gave us 28 days of credit for February, because our lease expired in March. They also gave us 8 days credit, \$10.32, for storage until the end of January, and another \$40 credit for storage in February. So we had credits worth \$4401.32. You can see this properly reflected on the January 23rd line, for storage, in the amount of \$7029.20.

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This is proof that we had moved out, and that they were aware that we had moved out. So you can imagine our surprise when they didn't say anything to us about the past due rent, didn't forgive it as promised, sat on it for months, and then turned it over to a collection agency. They didn't notify us of the claimed overdue amount, giving us a chance to properly contest it, until it was sent to IQ Data who contacted us.

Even if that information was correct the date of first delinquency would not be correct. That date would not be May 2019, it would go back to the date they are first claiming we are overdue, which would be November 2017.

Under USC 1681i if a disputed items is found to be inaccurate or incomplete the CRA must delete or modify the information and notify the furnisher. Here the information is inaccurate, because we had a verbal agreement that released us from our contract on move out so that they could renovate, and that alone would cause this bill to be inaccurate where they billed us after we had moved out, and if they are unwilling to honor that agreement the date of first delinquency would be November 2017, not May 2019 as they are claiming.

If you don't think that alone is enough to remove the item, than you need to conduct a reasonable investigation. In a case like ours, where there was a verbal agreement, IQ Data is not in a position to know what the agreement was, so you'll need to go back to Wirtz about the agreement.

Finally, if there is a question about the evidence presented, because the FCRA is a consumer protection statute and is supposed to be interpreted in favor of the consumer please remember to err on the side of the consumer.

When you have removed the item, or completed your investigation, please let me know the outcome, along with any additional information your reinvestigation may have uncovered.

I anticipate that your review will result in a deletion of this questionable information. Within the 30 day period specified by federal law, please revise my credit file accordingly and respond to me by letter in kind. Otherwise, I may be forced to escalate this matter legally.

Thank you for your careful attention.

Yours truly,



Scott Himmel



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EXHIBIT D

I.Q. DATA INTERNATIONAL, INC.
21222 30TH DRIVE SE #120, BOTHELL, WA 98021
MONDAY-FRIDAY 8 A.M. TO 5 P.M. PST
P.O. BOX 340, BOTHELL, WA 98041

TOLL FREE: (888)-248-2509 OR (425)-609-2150 FAX: (425)-609-2104

DECEMBER 8, 2020

PRF
HIMMEL, SCOTT
HIMMEL, DEBORAH

Account#: 0008505017

RE: Original Creditor: 3260-3270 N LAKE SHORE DR (IL)

Principal Due:	\$10639.40
Interest Due:	\$1530.32
Total Due:	\$12169.72

Dear SCOTT HIMMEL

In reference to your recent request, please find enclosed validation of debt you requested with 3260-3270 N LAKE SHORE DR (IL).

Please remit the balance in full of \$12169.72 or contact our office to discuss this debt.

Should you have any further questions, please contact the undersigned below.

Sincerely,

Account Representative
888-248-2509

I.Q. Data International, Inc. is not a debt buyer. We are a third party debt collection agency retained by your former property management company to collect on your outstanding debt.

This communication from a debt collector is an attempt to collect a debt and any information obtained will be used for that purpose. Your outstanding principal balance will accrue interest at a rate of 005.00 percent per annum.

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

EXHIBIT E

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

EDELMAN, COMBS, LATTUR
 20 South Clark Street
 Chicago, IL 60606
 (312) 739-7440
 (800) 644-7440
 (312) 419-0374
 Email: info@edcon.com
www.edcon.com
 February 25, 2021

CERTIFIED AND REGULAR MAIL

Equifax Information Services, LLC
 P.O. Box 105069
 Atlanta, GA 30348

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®**OFFICIAL USE**

Certified Mail Fee \$
 Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postmark
Here

Postage \$
 Total Postage and Fees \$

2/25

Sent To *Equifax*Street and Apt. No., or PO Box No. *PO Box 105069*City, State, ZIP+4® *Atlanta GA 30348*

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

Sent To *Wamsutter*Street and Apt. No., or PO Box No. *PO Box 900*City, State, ZIP+4® *Woodlawn PA 19094*

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

Sent To *Experian*Street and Apt. No., or PO Box No. *PO Box 4500*City, State, ZIP+4® *Allen TX 75013*

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

Experian
 701 Experian Pkwy.
 P.O. Box 4500
 Allen, TX 75013

Re: Scott Himmel and Deborah Himmel, [REDACTED]

SSNs: [REDACTED] (Scott); and [REDACTED] (Deborah)

Ladies/ Gentlemen:

You are erroneously reporting a nonexistent debt allegedly owed by our above clients. The tradeline is from debt collector I. Q. Data International under account number IQDOWRC0048505017 and purports to represent unpaid rent.

In December 2017, our clients agreed with the building manager to move out in exchange for a waiver of further obligations under the lease. The condition of the leased premises was poor, giving rise to potential claims, and the manager wanted to renovate the apartment. Our clients did move out on January 23, 2018.

The existence of the agreement is shown by the fact that credits of \$892.65 rent and \$10.32 storage were given for the remaining 8 days of January 2018. Obviously, no credits would have been given had there been further rent obligations owing.

After doing nothing for 18 months – a length of time inconsistent with the notion that anything further was owed – collection agency I. Q. International tried to collect the waived balance. Nothing is owed and the debt should be reported as paid in full as agreed.

Please respond within 30 days and send a corrected credit report showing deletion of this item. Our client's authorization for the release of credit information is enclosed.

You are specifically requested to provide a copy of this letter and enclosures to anyone asked to investigate this matter.

Sincerely yours,

/s/ Daniel A. Edelman
Daniel A. Edelman

cc: clients (regular mail)

I.Q. Data International, Inc., 21222 30th Drive SE, #L20, Bothell, WA 98021 (regular mail)

I.Q. Data International, Inc., PO Box 340, Bothell, WA 98041 (regular mail)

I.Q. Data International, Inc., FAX to (425) 609-2104

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

EDELMAN, COMBS, LATTURNER & GOODWIN, LLC

20 South Clark Street, Suite 1500

Chicago, Illinois 60603

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: info@edcombs.com

www.edcombs.com

AUTHORIZATION

Scott Himmel and Deborah Himmel hereby authorize Edelman, Combs, Latturner & Goodwin, LLC to obtain credit reports and information for the purpose of attempting to correct or remove erroneous information from them.



Scott Himmel

Address

City, State and Zip Code

Social Security Number

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

[REDACTED]

Deborah Himmel

[REDACTED]

Address

[REDACTED]

City, State and Zip Code

[REDACTED]

Social Security Number

[REDACTED]

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

EXHIBIT F

PO Box 9701
Allen, TX 75013



0004588 01 MB 0.436 **AUTO T4 0 7010 60606-141001 -C01-P04592-1
SCOTT HIMMEL



1/12

SCOTT HIMMEL

Dispute Results

Report # 2689-9022-42 for 01/12/21

Our reinvestigation of the dispute(s) and/or other request(s) you recently submitted is now complete. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the requested status at the time of our reinvestigation.

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record. If we were able to make changes to your credit report based on information you provided, or if you requested the addition of a statement, we have done so. Otherwise, we have contacted the company reporting the information you disputed, supplied them all relevant information and any documents you gave us with your dispute, and instructed them to: review all information we provide them about your dispute; verify the accuracy of the information; provide us a response to your dispute; and update their records and systems as necessary.

How to read your results

Deleted - This item was removed from your credit report. **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. **Updated** (Your results will indicate which one of the following applies.) - a) The information you disputed has been updated. Please review your report for the details. b) The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details. c) The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details. d) Information on this item has been updated. Please review your report for the details. **Processed** - This item was either updated or deleted; Please review your report for the details.

Here are your results

Credit items

IQ DATA INTERNATIONAL IQDOWRC0048505017 Outcome: Updated - The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details.

Before dispute

7010 01 00 0004588 0001 C010765

SCOTT HIMMEL | Report # 2689-9022-42 for 01/12/21

DATA INTERNATIONAL Partial Acct # 10D0WRC0048505017 1010 SE EVERETT MALL WAY 100 EVERETT WA 98208 (888) 248-2509

Date opened
May 2019

Address ID #
0357615680

Original creditor
3260-3270 N LAKE
SHORE DR IL

Type
Collection

Responsibility
Joint

First reported
Aug 2019

Terms
1 Months

Monthly payment
Not reported

Credit limit or original amount
\$10,639

High balance
Not reported

Recent balance
\$12,177 as of Dec 2020

Status
Collection account.

Comment
This account is scheduled to continue on record until Oct 2024.

Date of Status
May 2019

Payment history

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020	C	C	C	C	C	C	C	C	C	C	C	C
2019								C	C	C	C	C



Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Nov20	Oct20	Sep20	Aug20	Jul20	Jun20	May20	Apr20	Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19
AB (\$)	12,124	12,083	12,032	11,991	11,951	11,900	11,859	11,818	11,767	11,726	11,685	11,634	11,594	11,543	11,503
DPR	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SPA (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
AAP (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aug19															
AB (\$)	11,461														
DPR	ND														
SPA (\$)	ND														
AAP (\$)	ND														

The original amount of this account was \$10,639

After dispute

DATA INTERNATIONAL Partial Acct # 10D0WRC0048505017 1010 SE EVERETT MALL WAY 100 EVERETT WA 98208 (888) 248-2509

Date opened
May 2019

Address ID #
0357615680

Original creditor
3260-3270 N LAKE
SHORE DR IL

Type
Collection

Responsibility
Joint

First reported
Aug 2019

Terms
1 Months

Monthly payment
Not reported

Credit limit or original amount
\$10,639

High balance
Not reported

Recent balance
\$12,177 as of Jan 2021

Status
Collection account.

Comment
This account is scheduled to continue on record until Oct 2024.

Date of Status
May 2019

Payment history

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2021	C											
2020	C	C	C	C	C	C	C	C	C	C	C	C
2019								C	C	C	C	C

Account History * (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Nov20	Oct20	Sep20	Aug20	Jul20	Jun20	May20	Apr20	Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19
AB (\$)	12,124	12,083	12,032	11,991	11,951	11,900	11,859	11,818	11,767	11,726	11,685	11,634	11,594	11,543	11,503
DPR	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SPA (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
AAP (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aug19															
AB (\$)	11,461														
DPR	ND														
SPA (\$)	ND														
AAP (\$)	ND														

The original amount of this account was \$10,639

If our reinvestigation has not resolved your dispute, you have several options:

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EXHIBIT G

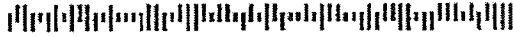
*** 373067449-056 ***
TransUnion LLC
PO Box 805
Woodlyn, PA 19094-0805



01/12/2021



PDF7MF00201285-I012459-076856265



SCOTT D. HIMMEL



TRANSUNION 1/12

FILED DATE: 3/19/2021 4:51 PM 2021CH01334

Dear SCOTT D. HIMMEL,

We understand that recently something on your credit report did not seem right to you. We take this matter seriously, and we want to make sure your TransUnion credit report is accurate. It's our commitment to you.

Our investigation of the dispute you submitted is now complete. After a review of your dispute and any provided documentation, we took one or more of the following action(s):

1. Updated your credit report based on the information you provided; OR
2. Determined that the information you disputed either does not appear on your credit file or already shows the requested status; OR
3. Determined that the data furnisher had previously verified the reported information. If any of the items you disputed were previously verified, a separate communication was sent to you listing those items along with the data furnisher's contact information; OR
4. Asked the data furnisher reporting the information you disputed to do all of the following:
 - Review relevant information we sent them, including any provided documents
 - Investigate your dispute and verify whether the information they report is accurate
 - Provide us a response to your dispute and update any other information
 - Update their records and systems, if necessary;

Should you wish to receive the above description of the procedures we used to investigate your dispute in a separate communication for your records, please contact TransUnion.

Your dispute is important. In the pages that follow, you will see your detailed investigation results, including the name and contact details of the source of the information. Please review the results carefully. To view a full copy of your credit report and for more information about how to read your credit report, please visit www.transunion.com/fullreport.

How to Read Your Investigation Results

You will see that, for each disputed item, a summary explanation appears in the gray box, followed by a brief paragraph describing the results of our investigation, followed by a view of how the item appears in your updated credit report. Please note any changes we made to personal information (name, address, employment, SSN, date of birth) will appear at the end of **Your Investigation Results**.

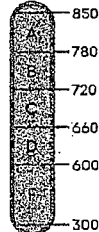
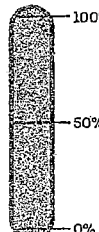
File Number: 373067449
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TransUnion Credit Score

SCOTT D. HIMMEL

YOUR CREDIT SCORE

Your Score & Grade	Score & Grade Range	Where You Rank
<p>Score Not Purchased (See Below)</p> <p>Grade -</p> <p>Created on 01/12/2021</p> <p>Based on your TransUnion credit report, this is a depiction of your creditworthiness.</p>	<p>Unavailable (See Below)</p>  <p>The numerical score ranges from 850 to 300 equaling grade ranges from A to F.</p>	<p>Unavailable (See Below)</p>  <p>Your credit ranks higher than --% of the nation's population.</p>

Summary

You did not order a TransUnion credit score. You can purchase your credit score for \$9.95 by calling 1-866-SCORE-TU or 1-866-726-7388.

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Your Investigation Results

INVESTIGATION RESULTS - VERIFIED AS ACCURATE: The disputed item was verified as accurate.

IQ DATA INT'L INC #IQD0WRC004850**** (PO BOX 39, BOTHELL, WA 98041, (888) 248-2509)

We investigated the information you disputed and the disputed information was **VERIFIED AS ACCURATE**.

Here is how this item appears on your credit report following our investigation.

Placed for collection:	05/07/2019	Balance:	\$12,177	Pay Status:	>In Collection<
Responsibility:	Individual Account	Date Updated:	12/13/2020		
Account Type:	Open Account	Original Amount:	\$10,639		
Loan Type:	COLLECTION	Original Creditor:	MEDICAL-3260 3270 N		
	AGENCY/ATTORNEY		LAKE SHORE DR IL		
			(Rental/Leasing)		
		Past Due:	>\$12,177<		

Remarks: ACCT INFO DISPUTED BY CONSUMR; >PLACED FOR COLLECTION<

Estimated month and year that this item will be removed: 12/2024

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